DFG's RECOMMENDED APPROACH FOR ADDRESSING SERVICE AREA IMPACTS

Page 7-56; Table 7.2-1; SWP and CVP Service Areas:

Put a rating of adverse, non-significant impact (o) for the No-Action and alternatives 1A and 1B. All other alternatives should receive a rating of significant and mitigable (a dark semi-circle).

Page 7-68; Section 7.2.1.5; SWP and CVP Service Areas Outside the Central Valley:

Delete the current paragraph and insert the following:

The SWP and CVP service areas outside of the Central Valley contain a large diversity of both lowland and upland habitats and species. Urban growth has reduced the area and connectivity of important habitats that are critical to sustaining a wide variety of unique plants and animals. The conflict between urban growth and conservation of native habitat has resulted in the listing of a number of plants and animals that were threatened with extinction. In response, local land use agencies working with state and federal fish and wildlife agencies, and development and environmental stakeholders have initiated and begun to implement large scale conservation planning efforts to reduce the conflict between development and listed species recovery.

Historical Perspective and Existing Condition. The most dramatic difference between the historic service area and that which is present today is the fragmentation of what were once large contiguous blocks of habitat such as chamise-redshank chaparral, coastal sage scrub, grassland, oak woodland, oak savanna, southern oak woodland-forest, riparian woodland-forest, succulent scrub, sand dune habitat, alkali desert scrub, desert riparian habitat, desert wash, freshwater/saltwater marsh, and coastal strand. These habitats were located in three sub-areas; the Central Coast Service Area, South Coast Service Area, and Southern Deserts Service Area.

Natural and Agricultural Communities. Significant changes to the natural landscape in the service areas occurred in the late 1800s and early 1900s with land conversions to agriculture, a pattern similar to the San Joaquin River Region. That pattern shifted dramatically compare to the San Joaquin River Region as urban growth in the service areas starting in the early 1900s began to displace agricultural lands and convert large areas of remaining native habitats.

Special-Status Species. Similar to the San Joaquin River Region and the Tulare Basin, changes in the natural landscape in the service areas took a toll on plant and wildlife species. California condor, light-footed clapper rail, California least tern, Least Bell's vireo, Belding's savannah sparrow, Southwestern willow flycatcher, California gnatcatcher, Mohave ground squirrel, Morro Bay kangaroo rat, Santa Ana River woollystar, and Santa Ynez false-lupine are all examples of species that have been listed.

Add a new section immediately prior to section 7.2.2.5 on page 7-79:

SWP and CVP Service Areas Outside the Central Valley

Together with improved transportation, expanded sewer, water, and utilities, and other factors, the alternatives will contribute to the inducement of growth by providing additional water supplies and improving the reliability of those supplies.

Alternative 1. Alternative configurations 1A and 1B will not result in a level of additional water supplies or improved supply reliability that would contribute to increased urban and industrial development and cause loss of critical habitats for special status species in the service areas. Alternative 1C, however, could contribute to increased urban and industrial development and cause loss of these habitats.

Alternatives 2 and 3. Additional water supplies and improved reliability of those supplies may contribute to increased urban and industrial development and cause additional loss of important upland habitats such as coastal sage scrub, and riparian and wetlands through increased contaminant input, increased incidence of human caused disturbance and other factors. Urban and industrial growth will result in the loss or degradation of wetland and riparian communities, and loss or degradation of important wildlife habitats and use areas.

Page 7-79; left column; third paragraph (single sentence):

Add: "The following section also summarizes potential mitigation measures specifically for the SWP and CVP service areas outside of the Central Valley".

Page 7-80; right column:

Add the following paragraph immediately prior to Section 7.2.2.6:

SWP and CVP Service Areas Outside of the Central Valley. To minimize impacts to state and federal listed species and their habitats in the service areas receiving water from the CALFED Program, CALFED shall annually provide funds to the appropriate implementing agency. For example; fifty cents per acre foot when the Program allows for increased exports above current levels of greater than 25 thousand acre-feet of water. All funds would be suitably indexed for inflation (e.g. January 1998 dollars) and provided by January 1 following the subject water year in which the increased exports occurred. The DFG will use the funds for actions such as implementing Habitat Conservation Plans (HCP) pursuant to Section 10 of the Federal Endangered Species Act, (FESA), Natural Community Conservation Plans (NCCP) pursuant to Fish and Game Code 2800, or other comprehensive area plans, approved by the USFWS and/or the DFG. Implementation includes purchasing of core conservation areas identified in those plans. This provision satisfies that portion of the Program's responsibility to address service area impacts. Obligations of project proponents whose projects also induce or cause adverse land use changes in the service area will be addressed in project specific consultations or through the mechanisms outlined in the applicable HCPs or NCCPs.

Page 7-81; left column:

Add at the end of this column the following:

SWP and CVP Service Areas Outside of the Central Valley. No significant unavoidable impacts were identified.

Chapter 10; pages 10-1 through 10-3; Growth-Inducing Impacts:

Insert the following at the beginning of the section:

Section 21100(b)(5) of CEQA requires that an EIR discuss the growth-inducing impacts of a proposed project CEQA Guidelines Section 15126(g) clarifies this requirement, stating that an EIR must address "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment." In addition, under authority of NEPA, the CEQ NEPA Regulation require consideration of the potential indirect impacts of a proposed project within an EIS. Indirect effects of an action include those that occur later in time or farther away in distance, but are still reasonably foreseeable (CEQ NEPA Regulation Section 1508.8(b)).

The CEQA Guidelines and the CEQ NEPA Regulation identify several ways in which a project could have growth-inducing impacts . In additions to the characteristics described above, projects that remove obstacles to population growth, and projects that encourage and facilitate other activities that are beyond those proposed as part of the project and that could affect the environment are considered growth-inducing (CEQA Guidelines Section 15126(g)).

The availability of adequate supplies of water is one of several potential obstacles to population growth, along with such things as: the availability of sewage treatment facilities; the availability of developable land; the types and availability of employment opportunities; housing costs and availability; commuting distances; cultural amenities; climate; and local government growth policies contained in general plans and zoning ordinances. Resource planners have long debated the role of water in papulation growth.

Section 1508.8(b) of the CEQ NEPA Regulations notes that indirect effects can include "growth inducing effects and other effects related to induced changes tin the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystem."

Growth inducement may not be considered necessarily detrimental, beneficial, or of significance under CEQA. Induced growth is considered a significant impact only if

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it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

Modify the last two sentences of the last paragraph in the left column on page 10-1 as follows:

For the purposes of this Programmatic EIS/EIR the assumption is that the increased water supplies and improved supply reliability associated with the program's alternatives will, along with the other factors mentioned above stimulate growth and remove barriers to growth, particularly in the SWP and CVP service areas outside of the Central Valley.

Page 10-1; right column; first paragraph; modify as follows:

Changes in overall growth and growth patterns can be estimated at the programmatic level for the SWP and CVP service areas. Any differences beyond estimates provided in this programmatic EIS/EIR would be analyzed in future tiered CEQA/NEPA documents.

Page 10-1; right column; fourth paragraph; modify as follows:

"In general, it is unlikely that any of the CALFED Program alternatives would result in substantial population or economic growth in the Delta, Bay, or Sacramento River regions. Water supply and quality would be improved by the implementation of the CALFED Program. These improvements in water supply, reliability, and quality could induce urban growth, particularly in the SWP and CVP service areas outside of the Central Valley. While this will benefit urban areas it will come at the expense of increased adverse impacts on habitats essential to support sensitive plant and animal species found in the service areas. Even though the exact location of the growth may never be possible to identify, the local land use plans in those areas describe where growth will occur and most have adopted land conservation plans that target protection of high quality habitat and restoration of degraded habitat to help recover listed species found within their land use planning jurisdictions.. A discussion of the assumed growth inducing impacts is contained in the section discussing vegetation and wildlife impacts. Further, these improvements could allow a shift to higher value crops....."

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Page 10-2; Table 10.1-1; fifth row:

Add the following:

Potential conversion of native habitats to urban uses.